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2	SUPREME COURT OF THE STATE OF NEW YORK
3	COUNTY OF KINGS
4	x
5	STALIN RODRIGO REYES ESPINOZA,
6	Plaintiff,
7	-against-
8	DAVS PARTNERS LLC AND KALNITECH
	CONSTRUCTION COMPANY,
9	
	Defendants.
10	
	x
11	
	Veritext Virtual
12	
	November 17, 2021
13	12:11 p.m.
14	
15	EXAMINATION BEFORE TRIAL of STALIN
16	RODRIGO REYES ESPINOZA, the Plaintiff in
17	the above-entitled action, held at the
18	above time and place, taken before Carol
19	Ellinghaus, a Notary Public of the State
20	of New York, pursuant to an Order and
21	stipulations between Counsel.
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23	* * *
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2	APPEARANCES:
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	BY: JARED TURCO, ESQ.
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7	RICHMAN & LEVINE, PC
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9	Garden City, New York 11530
10	BY: KETH RICHMAN, ESQ.
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12	LAW OFFICE OF MICHAEL SWIMMER
	Attorneys for Defendant
13	Kalnitech Construction Company
14	605 3rd Avenue, 9th Floor
15	New York, New York 10158
16	BY: ROBERT BRIGANTIC, ESQ. ALSO PRESENT: Daniel Rodriguez,
1.0	Spanish Interpreter
17	Nora Youmans,
Ι,	Spanish Interpreter
18	Spanish interpreter
10	* * *
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Page 58 1 S. Espinoza 2 Prior to lunch, we were talking Q. 3 about your second job while you were 4 living in the United States of putting 5 metals or columns for interior walls. 6 You said you started in or about 7 January of 2019 and worked there for two 8 months; correct? 9 Α. Yes. 10 What was the reason you left Q. 11 that job? 12 Α. Because they didn't have any jobs. 13 14 Q. What was your next job? 15 Α. Working with this gentleman. 16 0. Working with what gentleman? 17 Α. With the company. The company. 18 We are talking about Jim 0. 19 Associates? 20 Α. Yes. 21 When did you start working for Q. 22 Jim Associates, what month? 23 Approximately in May. Α. 24 Of what year? Q. 25 2019. Α.